

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
V.) Crim. No. 15-cr-10271-WGY
)
ALEX LEVIN)
)

DEFENDANT'S PROPOSED VOIR DIRE OF POTENTIAL JURORS

The defendant respectfully requests, pursuant to Fed. R. Crim. P. 24(a), in an effort to obtain an impartial jury, that this Court permit defense counsel to ask the questions set forth below and any appropriate follow-up questions, to the individual members of the venire. The defendant requests that each juror be questioned on an individual basis. As grounds for individual questioning, the defendant's right to a fair trial requires a careful examination of prospective jurors' potential biases. The questions may evoke strong feelings and emotions which the prospective jurors may be reluctant to voice openly. Further, the questions touch upon topics that many prospective jurors may find embarrassing to answer candidly in a group setting. The defendant therefore requests that the questions be asked on an individual basis in order to provide maximum privacy and confidentiality to the prospective jurors.

Proposed Questions for the Venire as a Group

1. Have you, a family member, or a close friend ever been an employee of or associated with an organization that investigates allegations of child abuse, or worked

with child abuse victims, such as the Department of Children and Families, the Department of Social Services, or advocacy groups for abused children?

2. Have you, a family member, or close friend ever worked for a local, state, or federal law enforcement agency, such as the police, F.B.I., or a prosecutor's office?
3. Would you hold it against Mr. Levin in any way if he did not testify at this trial or call any witnesses on his behalf?

Proposed Questions for the Venire Individually

1. Have you, a family member, or close friend ever been the victim of sexual abuse?
2. The allegations against Mr. Levin are that he knowingly possessed child pornography. Do you have a reaction to the allegations that might make it difficult for you to be fair and impartial in this case?
3. The jury will have to view photographs and videos that the government alleges to be child pornography. The evidence includes videos of children engaged in graphic sexual acts. Do you think that viewing such images would upset or disturb you in such a way that would affect your ability to remain fair and impartial in this case?

ALEX LEVIN
By his attorneys,
CARNEY & ASSOCIATES

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May 17, 2019

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

J. W. Carney, Jr.
J. W. Carney, Jr.

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AFFIDAVIT SUPPORTING DEFENDANT'S PROPOSED VOIR DIRE OF
POTENTIAL JURORS

I, J. W. Carney, Jr., state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

J. W. Carney, Jr.
J. J. Carney, Jr.

May 17, 2019